



Ashland Chemical Company

DIVISION OF ASHLAND OIL, INC.

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ENGINEERING DEPARTMENT

R. O. Spooner
Director of Engineering

August 10, 1983

Mr. Lawrence Wapensky, Section Chief
Hazardous Waste Permitting Section
U.S. EPA Region 8AW-WM
1860 Lincoln Street
Denver, Colorado 80295

RECEIVED

AUG 12 '83

WASTE MGT. BR.

Subject: Interim Status Request
Ashland Chemical Company
3350 South Zuni Street
Englewood, Colorado 80110
EPA I.D. No. COTO900100

Dear Mr. Wapensky:

This letter is a follow-up of our phone conversation of August 2, 1983 and Mr. Anderson's letter of April 21, 1983. As you recall it was Ashland's position that this plant met the conditions for interim status to store drummed wastes. However, the problem as you have pointed out is that Ashland missed the deadline date for filing form 8700-12 (Notification of Hazardous Waste Activity). We had filed this form on October 7, 1980. The deadline for filing according to Section 3010(a) of RCRA was August 18, 1980.

The purpose of this letter is to provide evidence of the reason for our late filing. Ashland was negotiating for ownership of this plant during July-October of 1980. During this time there was confusion as to who should file. We assumed that Independent Petrochemical Corporation, the previous owner, had filed a form 8700-12.

As the attached warranty deed shows Ashland acquired ownership of this facility on September 29, 1980. We subsequently filed form 8700-12 on October 7, 1980.

We continue to seek interim status for this plant. We request your consideration on the following bases.

Mr. Lawrence Wapensky

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August 10, 1983

- (1) This facility was in existence prior to November 19, 1980.
- (2) The late filing of form 8700-12 was due to confusion during change of ownership. This form was filed one week after we had acquired ownership.
- (3) We had submitted a Part A permit application prior to our becoming subject to 40 CFR 265.

We would appreciate your further consideration of our request for interim status for the Englewood plant.

Very truly yours,

Eldon E. Ronning

Eldon E. Ronning
Environmental Engineer

EER/cmg

Attachment